

# EXHIBIT 13



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## SB1 Litigation: OCA Plaintiffs' intent to file motion to compel

1 message

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Mon, Dec 12, 2022 at 12:04 PM

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Counsel,

In light of the parties' inability to reach agreement on discovery issues discussed via meet and confer and e-mail correspondence, OCA Plaintiffs intend to file a motion to compel your client, Harris County District Attorney Kim Ogg, to produce responsive documents and answer interrogatories in the SB1 consolidated litigation. Please let us know by 5 p.m. central Tuesday, December 13, 2022, whether you oppose the planned motion.

OCA Plaintiffs additionally offer, one final time, to negotiate a production timeline subject to Plaintiffs' narrowed discovery requests as set out in their letter of November 18, 2022.

Thank you,

**Zach Dolling**

Texas Civil Rights Project

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